

SARITA KEDIA
LAW OFFICES, P.C.

5 EAST 22ND STREET, SUITE 7B
NEW YORK, NEW YORK 10010
WWW.KEDIALAW.COM

INFO@KEDIALAW.COM

TEL: 212.681.0202
FAX: 212.614.0202

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BY ECF & E-MAIL

Nicole Argentieri
Rachel Nash
Allon Lifshitz
Assistant United States Attorneys
Eastern District of New York
271 Cadman Plaza East
Brooklyn, New York 11201

Re: United States v. Guerra, et al., S-4 10 Cr. 147 (SLT)

Dear Government Counsel:

We ask that the following persons, who are in the government's control and/or Bureau of Prisons custody, be produced to testify as defense witnesses at trial. We ask that they be brought to this district as expeditiously as possible in order that we may have the opportunity to meet with them prior to the defense case:

Maritza Medina
Ronald Moran
John Paladino
John Pappa
Alphonse Persico
Carmine Sessa

With respect to John Pappa and Alphonse Persico, defense counsel has discussed the matter with both of them, and we understand that both are willing to be produced and testify as defense witnesses. With respect to the other four witnesses requested, we have no information for them other than the government's representation that these witnesses do not wish to be interviewed by the defense. We reiterate our request to speak with these witnesses as soon as possible. Additionally, we renew our request for the government's last known contact information as to John Pate and Salvatore Miciotta.

Very truly yours,
/s/
Sarita Kedia
Paul Shechtman